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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

STEPHEN RAHER

Case No. CV 09-526-ST

Plaintiff

v.

PLAINTIFF'S MOTION TO COMPEL
DISCOVERY

FEDERAL BUREAU OF PRISONS,

Fed. R. Civ. P. 37(a)
Request for Oral Argument

Defendant.

I. Certification Pursuant to L.R. 7.1 and F.R.C.P. 37(a)(1)

Plaintiff certifies that, prior to filing this motion, he conferred in good faith with counsel for defendant Bureau of Prisons (“BOP”), by speaking with BOP’s counsel and seeking alternate means of resolving this dispute. Despite conferring, the parties have been unable to resolve their differences.

II. Motion

A. Request for Production

Plaintiff Stephen Raher moves the court for an order overruling the objections filed by defendant BOP to plaintiff’s first request to produce documents for inspection and copying, and compelling BOP to produce and permit inspection and copying of these documents no later than 10 days following the entry of the court’s order.

B. Interrogatories

Plaintiff also moves the court for an order overruling the objections filed by defendant BOP to plaintiff's first set of interrogatories, and compelling BOP to answer plaintiff's interrogatories no later than 10 days following the entry of the court's order.

III. Grounds for Relief

1. The moving party hand delivered a request for production of documents to defendant's counsel, Kevin Danielson, on November 20, 2009.
2. On December 21, 2009, defendant BOP responded to plaintiff's request for production by invoking several general objections and declining to produce any of the requested documents.
3. The moving party hand delivered interrogatories to defendant's counsel, Kevin Danielson on November 20, 2009.
4. On December 21, 2009, defendant BOP responded to plaintiff's interrogatories by invoking several general objections and declining to answer any interrogatories.
5. As shown in the accompanying memorandum of law, there is no justification for the objections that defendant BOP has articulated, so that a motion to compel BOP to produce the requested documents and answer plaintiff's interrogatories should be granted under Fed. R. Civ. P. 37(a)(3)(B).

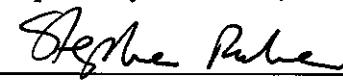
IV. Record on Motion

This motion is based on this document; on the accompanying Memorandum in Support of Plaintiff's Motion to Compel Discovery; on the accompanying Declaration of Stephen Raher, including its Exhibits, which include true and correct copies of the interrogatories, the responses,

and correspondence between parties; on all of the pleadings and motions already on file in this action; and, on whatever evidence and argument may be heard at any hearing on this motion.

Dated: January 6, 2010

Respectfully submitted,



Stephen Raher, pro se